

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Jayco, Inc.
903 South Main Street
Middlebury, Indiana 46540**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 039-5080-00265	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

B GENERAL CONDITIONS

- B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Permit Term [326 IAC 2-7-5(2)]
- B.4 Enforceability [326 IAC 2-7-7(a)]
- B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.6 Severability [326 IAC 2-7-5(5)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
- B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1)
and (6)] [326 IAC 1-6-3]
- B.13 Emergency Provisions [326 IAC 2-7-16]
- B.14 Permit Shield [326 IAC 2-7-15]
- B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]
- B.18 Permit Renewal [326 IAC 2-7-4]
- B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
- B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]
- B.22 Operational Flexibility [326 IAC 2-7-20]
- B.23 Construction Permit Requirement [326 IAC 2]
- B.24 Inspection and Entry [326 IAC 2-7-6(2)]
- B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
- B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]
- B.27 Enhanced New Source Review [326 IAC 2]

C SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates
Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]

- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Testing Requirements [326 IAC 2-7-6(1)]

- C.8 Performance Testing [326 IAC 3-6]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.9 Compliance Schedule [326 IAC 2-7-6(3)]
- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.11 Monitoring Methods [326 IAC 3]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
[326 IAC 2-7-6] [326 IAC 1-6]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]
- C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Assembly Lines and Coating Booths (Existing)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
- D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.1.6 Volatile Organic Compounds (VOC)
- D.1.7 VOC Emissions

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.1.8 Particulate Matter (PM)
- D.1.9 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.10 Record Keeping Requirements
- D.1.11 Reporting Requirements

D.2 FACILITY CONDITIONS - Spray Booths (EU SB-6 and SB-7), Proposed

General Construction Conditions

Effective Date of the Permit

First Time Operation Permit

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

D.2.7 Particulate Matter (PM) [326 IAC 6-3-2(c)]

D.2.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.2.9 Testing Requirements [326 IAC 2-7-6(1),(6)]

D.2.10 Volatile Organic Compounds (VOC)

D.2.11 VOC Emissions

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.12 Particulate Matter (PM)

D.2.13 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.14 Record Keeping Requirements

D.2.15 Reporting Requirements

D.3 FACILITY OPERATION CONDITIONS - Woodworking Operations

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3]

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

D.3.4 Particulate Matter (PM)

D.4 FACILITY OPERATION CONDITIONS - Insignificant Activities

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC)

D.4.2 Particulate Matter (PM) [326 IAC 6-3]

Compliance Determination Requirement

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Certification Form

Emergency/Deviation Occurrence Report

Monthly Report Form

Quarterly Report Form

Quarterly Compliance Monitoring Form

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary recreational vehicle manufacturing source.

Responsible Official: Larry Mast
Source Address: 903 South Main Street, Middlebury, Indiana 46540
Mailing Address: P.O. Box 460, Middlebury, Indiana 46540-0460
SIC Code: 3792
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) recreation vehicle assembly line, known as EU L-1, installed in 1973, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 10 RVs per hour.
- (b) One (1) recreation vehicle assembly line, known as EU L-4, installed in 1974, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (c) One (1) recreation vehicle assembly line, known as EU L-5, installed in 1974, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (d) One (1) recreation vehicle assembly line, known as EU L-22, installed in 1973, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (e) One (1) recreation vehicle assembly line, known as EU L-23, installed in 1974, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (f) One (1) recreation vehicle assembly line, known as EU L-8, installed in 1976 exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.

- (g) One (1) woodworking operation, known as EU W-16, installed in 1973, exhausted to vent W-16, consisting of various saws, routers, and milling equipment, equipped with one (1) baghouse, known as CE-16, exhausted to vent W-16, equipped with one (1) cyclone, known as CE-21, exhausted to P21-1, capacity: 1,100 pounds of wood per hour.
- (h) One (1) lamination operation, known as lamination, installed in 1973, exhausted internally, maximum capacity to support assembly line production.
- (i) One (1) metal and wood spray booth, known as EU SB-2, installed in 1973, exhausted to vents P4-1 and P4-2, using air assisted, airless, and conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.
- (j) One (1) wood component spray booth, known as EU SB-3, installed in 1973, exhausted to vent P4-3, using conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.
- (k) One (1) wood component dip tank, known as EU DB-4, installed in 1973, exhausted to vent P4-4, maximum capacity to support assembly line production.
- (l) One (1) adhesive on wood application area, known as EU SB-5, installed in 1976, exhausted to vent P8-1, using air atomized spray equipment, maximum capacity to support assembly line production.
- (m) One (1) recreation vehicle assembly line, known as EU L-3, installed in 1989, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (n) One (1) recreation vehicle assembly line, known as EU L-6, installed in 1987, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (o) One (1) wood component spray booth, known as EU SB-1, installed in 1992, exhausted to vent P16-1, using conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.
- (p) One (1) repair spray booth known as SB-6, to be installed in 1998, exhausted to vent P10-1, equipped with dry filter control, maximum capacity to support assembly line production.
- (q) One (1) repair spray booth, known as SB-7, to be installed in 1998, exhausted to P41-1, equipped with dry filter control, maximum capacity to support assembly line production.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPS: brazing equipment, cutting torches soldering equipment, welding equipment.
- (d) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
 - (2) Using 80 tons or less of welding consumables.
- (e) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (f) sewing, chop and band saws, small paint touch up guns of various designs

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

- (1) Enforcement action;
- (2) Permit termination, revocation and reissuance, or modification; or
- (3) Denial of a permit renewal application.

- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application forms, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;

- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
- (5) Any insignificant activity that has been added without a permit revision; and
- (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

-
- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless failure to implement the plan has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source.

In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%), any one (1) six (6) minute averaging period as in determined 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.

Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The following is descriptive information and does not constitute an enforceable condition; however, the Permittee should be aware that physical changes or changes in the method of operation that may render this descriptive information obsolete or inaccurate may also trigger requirements for permits or permit modifications under 326 IAC 2.

- (a) One (1) recreation vehicle assembly line, known as EU L-1, installed in 1973, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 10 RVs per hour.
- (b) One (1) recreation vehicle assembly line, known as EU L-4, installed in 1974, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (c) One (1) recreation vehicle assembly line, known as EU L-5, installed in 1974, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (d) One (1) recreation vehicle assembly line, known as EU L-22, installed in 1973, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (e) One (1) recreation vehicle assembly line, known as EU L-23, installed in 1974, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (f) One (1) recreation vehicle assembly line, known as EU L-8, installed in 1976 exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (h) One (1) lamination operation, known as lamination, installed in 1973, exhausted internally, maximum capacity to support assembly line production.
- (i) One (1) metal and wood spray booth, known as EU SB-2, installed in 1973, exhausted to vents P4-1 and P4-2, using air assisted, airless, and conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.
- (j) One (1) wood component spray booth, known as EU SB-3, installed in 1973, exhausted to vent P4-3, using conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.
- (k) One (1) wood component dip tank, known as EU DB-4, installed in 1973, exhausted to vent P4-4, maximum capacity to support assembly line production.
- (l) One (1) adhesive on wood application area, known as EU SB-5, installed in 1976, exhausted to vent P8-1, using air atomized spray equipment, maximum capacity to support assembly line production.
- (m) One (1) recreation vehicle assembly line, known as EU L-3, installed in 1989, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (n) One (1) recreation vehicle assembly line, known as EU L-6, installed in 1987, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (o) One (1) wood component spray booth, known as EU SB-1, installed in 1992, exhausted to vent P16-1, using conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compounds (VOC) content of coating delivered to the applicators at EU SB-2 shall be limited to three and a half (3.5) pounds of VOC per gallon of coating less water on a daily volumetrically weighted basis on all days when total VOC emissions from this spray booth exceed fifteen (15.0) pounds, for forced warm air or air dried coatings.

- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The VOC delivered to the applicators of the vehicle assembly line EU L-6 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Any change or modification which may increase actual VOC usage to twenty-five (25) tons per year or more from the vehicle assembly line EU L-6 will make the facilities subject to 326 IAC 8-1-6.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The PM from the eight (8) assembly lines (EU L-1, L-3, L-4, L-5, L-6, L-8, L-22, & L-23) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate for one hundred (100) up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) The PM from the four (4) spray booths, one (1) dip booth and one (1) lamination booth (EU SB-1, SB-2, SB-3, DB-4, SB-5 & Lamination) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

- (a) Compliance with Condition D.1.2 shall be demonstrated at the end of each month for EU L-6 based on the total volatile organic compound usage for the most recent twelve (12) consecutive month period.
- (b) Compliance with Condition D.1.1(a) shall be demonstrated at the end of each day for EU SB-2, based on the total volatile organic compound usage for the most recent day.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when any of the spray booths are in operation.

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating spray booth Stacks (P16-1, P4-1 and 2, P4-3 and P8-1), while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily for EU SB-2 shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day when using non-compliant coatings;
 - (4) The cleanup solvent usage for each day;
 - (5) The total VOC usage for each day; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly for EU L-6 shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.2.
 - (1) The amount of VOC in each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Condition D.1.3, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The following is descriptive information and does not constitute an enforceable condition; however, the Permittee should be aware that physical changes or changes in the method of operation that may render this descriptive information obsolete or inaccurate may also trigger requirements for permits or permit modifications under 326 IAC 2.

- (p) One (1) repair spray booth known as SB-6, to be installed in 1998, exhausted to vent P10-1, equipped with dry filter control, maximum capacity to support assembly line production.
- (q) One (1) repair spray booth, known as SB-7, to be installed in 1998, exhausted to P41-1, equipped with dry filter control, maximum capacity to support assembly line production.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.2]

General Construction Conditions

- D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

- D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.2.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM, may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.
- D.2.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

- D.2.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to:

Indiana Department of Environmental Management
Permit Administration & Development Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

To avoid the applicability of 326 IAC 8-2-9, the volatile organic compounds (VOC) delivered to the applicators at EU SB-6 and EU SB-7 shall be limited to less than fifteen (15) pounds per day, each.

D.2.7 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the two (2) spray booths (EU SB-6 and EU SB-7) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate for one hundred (100) up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.2.9 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.7 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.10 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.2.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.11 VOC Emissions

Compliance with Condition D.2.6 shall be demonstrated at the end of each day for EU SB-6 and EU SB-7 based on the total volatile organic compound usage for the most recent day.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.12 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when either of the spray booths are in operation.

D.2.13 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating spray booth Stacks (P10-1 and P41-1) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.14 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily for EU SB-6 and EU SB-7 shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.6.
 - (1) The amount of VOC in each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each day;
 - (4) The total VOC usage for each day; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.15 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.6 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The following is descriptive information and does not constitute an enforceable condition; however, the Permittee should be aware that physical changes or changes in the method of operation that may render this descriptive information obsolete or inaccurate may also trigger requirements for permits or permit modifications under 326 IAC 2.

- (g) One (1) woodworking operation, known as EU W-16, installed in 1973, exhausted to vent W-16, consisting of various saws, routers, and milling equipment, equipped with one (1) baghouse, known as CE-16, exhausted to vent W-16, equipped with one (1) cyclone, known as CE-21, exhausted to P21-1, capacity: 1,100 pounds of wood per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the wood-working facilities shall not exceed 2.75 pounds per hour when operating at a process weight rate of 1,100 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate for one hundred (100) up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.4 Particulate Matter (PM)

The baghouse and cyclone for PM control shall be in operation at all times when the woodworking processes are in operation and exhausting to the outside atmosphere.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.
- (d) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
 - (2) Using 80 tons or less of welding consumables.
- (e) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (f) sewing, chop and band saws, small paint touch up guns of various designs

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

- (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.4.2 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate for one hundred (100) up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirement

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Jayco, Inc.
Source Address: 903 South Main Street, Middlebury, Indiana 46540
Mailing Address: P. O. Box 260, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-5080-00265

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- ☒ Annual Compliance Certification Letter
- ☐ Test Result (specify) _____
- ☐ Report (specify) _____
- ☐ Notification (specify) _____
- ☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Jayco, Inc.
Source Address: 903 South Main Street, Middlebury, Indiana 46540
Mailing Address: P. O. Box 260, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-5080-00265

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9	1. This is an emergency as defined in 326 IAC 2-7-1(12) <input type="checkbox"/> The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and <input type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) <input type="checkbox"/> The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Monthly Report

Source Name: Jayco, Inc.
Source Address: 903 South Main Street, Middlebury, Indiana 46540
Mailing Address: P. O. Box 260, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-5080-00265
Facility: EU SB-6 and EU SB-7
Parameter: Volatile Organic Compounds
Limit: Less than 15 pounds per day

Month: _____ Year: _____

Day	EU SB-6	EU SB-7		Day	EU SB-6	EU SB-7	
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Jayco, Inc.
Source Address: 903 South Main Street, Middlebury, Indiana 46540
Mailing Address: P. O. Box 260, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-5080-00265
Facility: EU L-6
Parameter: Volatile Organic Compounds
Limit: Less than 25 tons per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Jayco, Inc.
Source Address: 903 South Main Street, Middlebury, Indiana 46540
Mailing Address: P. O. Box 260, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-5080-00265

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of Each Deviation

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name:	Jayco, Inc.
Source Location:	903 South Main Street, Middlebury, IN 46540
County:	Elkhart
SIC Code:	3792
Operation Permit No.:	T 039-5080-00265
Permit Reviewer:	Frank P. Castelli

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Jayco, Inc. relating to the operation of a recreational vehicle manufacturing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) recreation vehicle assembly line, known as EU L-1, installed in 1973, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 10 RVs per hour.
- (b) One (1) recreation vehicle assembly line, known as EU L-4, installed in 1974, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (c) One (1) recreation vehicle assembly line, known as EU L-5, installed in 1974, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (d) One (1) recreation vehicle assembly line, known as EU L-22, installed in 1973, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.

- (e) One (1) recreation vehicle assembly line, known as EU L-23, installed in 1974, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (f) One (1) recreation vehicle assembly line, known as EU L-8, installed in 1976 exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (g) One (1) woodworking operation, known as EU W-16, installed in 1973, exhausted to vent W-16, consisting of various saws, routers, and milling equipment, equipped with one (1) bag-house, known as CE-16, exhausted to vent W-16, equipped with one (1) cyclone, known as CE-21, exhausted to P21-1, capacity: 1,100 pounds of wood per hour.
- (h) One (1) lamination operation, known as lamination, installed in 1973, exhausted internally, maximum capacity to support assembly line production.
- (i) One (1) metal and wood spray booth, known as EU SB-2, installed in 1973, exhausted to vents P4-1 and P4-2, using air assisted, airless, and conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.
- (j) One (1) wood component spray booth, known as EU SB-3, installed in 1973, exhausted to vent P4-3, using conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.
- (k) One (1) wood component dip tank, known as EU DB-4, installed in 1973, exhausted to vent P4-4, maximum capacity to support assembly line production.
- (l) One (1) adhesive on wood application area, known as EU SB-5, installed in 1976, exhausted to vent P8-1, using air atomized spray equipment, maximum capacity to support assembly line production.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

The source also consists of the following unpermitted facilities/units:

- (m) One (1) recreation vehicle assembly line, known as EU L-3, installed in 1989, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (n) One (1) recreation vehicle assembly line, known as EU L-6, installed in 1987, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (o) One (1) wood component spray booth, known as EU SB-1, installed in 1992, exhausted to vent P16-1, using conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.

New Emission Units and Pollution Control Equipment Requiring ENSR

The application includes information relating to the construction and operation of the following equipment:

- (p) One (1) repair spray booth known as SB-6, to be installed in 1998, exhausted to vent P10-1, equipped with dry filter control, maximum capacity to support assembly line production.
- (q) One (1) repair spray booth, known as SB-7, to be installed in 1998, exhausted to P41-1, equipped with dry filter control, capacity: maximum capacity to support assembly line production.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (f) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (g) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (i) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kilopascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or;

- (2) having a vapor pressure equal to or less than 0.7 kilopascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.
- (k) Closed loop heating and cooling systems.
- (l) Infrared cure equipment.
- (m) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
 - (2) Using 80 tons or less of welding consumables.
- (n) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (o) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (p) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.
- (q) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (r) Paved and unpaved roads and parking lots with public access.
- (s) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (t) Emergency generators as follows:
 - (1) Gasoline generators not exceeding 110 horsepower.
 - (2) Diesel generators not exceeding 1,600 horsepower.
 - (3) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.
- (u) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (v) sewing, chop and band saws, small paint touch up guns of various designs

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following: list permits, registrations, modifications, exemptions, etc.

- (a) OP 20-04-83-0545, issued on April 24, 1979; and
- (b) Registration letter issued March 29, 1983.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on November 30, 1995. Additional information was received on February 9, 1996, October 22, 1996, December 9, 1996, September 30, 1997, November 3, 1997 and July 7, 1998.

A notice of completeness letter was mailed to the source on May 8, 1997.

Emission Calculations

See pages 1 and 2 of 2 of Appendix A of this document for detailed emissions calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	greater than 100, less than 250
PM ₁₀	greater than 100, less than 250
SO ₂	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Toluene	greater than 10
Ethyl Benzene	less than 10
Xylene	less than 10
MEK	less than 10
MIBK	less than 10
Hexane	greater than 10
Methylene Chloride	less than 10
1,1,1 Trichloroethane	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of volatile organic compounds and PM₁₀ are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the OAM 1996 emission data for the criteria pollutants and the 1997 applicant supplied emission data for all the HAPs.

Pollutant	Actual Emissions (tons/year)
PM	0.000
PM ₁₀	0.000
SO ₂	0.000
VOC	105
CO	0.000
NO _x	0.000
Toluene	16.1
Ethyl Benzene	0.478
Xylene	1.61
MEK	0.756
MIBK	0.011
Hexane	12.2
Methylene Chloride	0.557
1,1,1 Trichloroethane	0.000

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Assembly EU L-1, EU L-3 through EU L-6, EU L-8, EU L-22 & EU L-23	3.40	3.40	0.00	171	0.00	0.00	98.3
Surface Coating EU SB -1 through EU SB-3, EU SB-5 through EU SB-7, EU DB-4 & Lamination	0.474	0.474	0.00	23.7	0.00	0.00	8.82
Woodworking EU W-16	0.938	0.938	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	5.00	5.00	3.00	5.00	2.00	4.00	3.00
Total Emissions	9.81	9.81	3.00	200	2.00	4.00	110

VOC emissions from EU L-6 are limited to less than 25 tons per year to avoid the applicability of 326 IAC 8-1-6.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
TSP	attainment
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12), 40 CFR Part 60 applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) applicable to this source.

This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart JJ since the plant does not manufacture any products in the SIC codes listed in the definition of wood furniture. The wood components manufactured at this source are structural and are not considered furniture.

The degreasing operations performed in assembly lines EU L-1, EU L-3 through EU L-6, EU L-8, EU L-22, EU L-23 and Lamination are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP) because the cleaning solvents used are not part of the applicability as specified in 40 CFR Part 63, Subpart T.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of volatile organic compounds in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-1-3.4 (New Source Toxics Control)

The two (2) spray booths (EU SB-6 and EU SB-7), to be constructed in 1998, are minor sources of hazardous air pollutants (HAPS). Therefore, the requirements of 326 IAC 2-1-3.4 do not apply to these facilities.

326 IAC 6-3-2 (Process Operations)

- (a) The spray operations, the insignificant woodworking and welding activities shall comply with 326 IAC 6-3-2(c). The 326 IAC 6-3-2 equations are as follows: $E = 4.10 P^{0.67}$, where P equals process weight in tons per hour for process weights up to and including sixty thousand (60,000) pounds per hour and E equals the allowable emission rate in pounds per hour.

For process weights in excess of sixty thousand (60,000) pounds per hour, the following equation is used: $E = 55.0 P^{0.11} - 40$. Compliance for the spray operation will be obtained by the use of dry filters for overspray control.

- (b) For the woodworking operation, EU W-16, with a process weight rate of 1,100 pounds per hour, the PM limit is 2.75 pounds per hour (12.0 tons per year). The controlled potential PM emission rate from the woodworking operation is 0.214 pounds per hour (0.938 tons per year) and therefore the woodworking operation complies with this rule.

The cyclone, known as CE-21, and baghouse, known as CE-16, shall be in operation at all times when the woodworking activities are in operation, in order to comply with this limit.

326 IAC 8-1-6 (Best Available Control Technology)

The lamination booth, EU L-6, is the only facility constructed after January 1, 1980 with potential VOC emissions greater than 25 tons per year. Therefore, EU L-16 is potentially subject to 326 IAC 8-1-6. The source has agreed to limit VOC emissions from the lamination booth, EU L-16, to less than 25 tons per year and therefore this rule does not apply.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The VOC emissions from spray booths EU SB-6 and EU SB-7 will be limited to less than 15 pounds per day for each booth. Therefore, the requirements of this rule will not apply to the operations performed in these two (2) booths.

The VOC content of the materials used to coat metal in booth EU SB-2 shall be limited to 3.5 pounds per gallon of coating less water, for forced warm air dried coatings. This limit will be complied with on a daily volumetrically weighted basis on all days when VOC emissions exceed 15 pounds.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

326 IAC 8-2-12 (Surface coating emission limitations: wood furniture and cabinet coating)

This rule does not apply to the operations at this source since the rule applies to sources that manufacture wood furnishings and this source does not manufacture wood furnishings.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The insignificant activity, degreasing operations are subject to the requirements of 326 IAC 8-3.

326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control)

The degreasing activities performed in assembly lines EU L-1, EU L-3 through EU L-6, EU L-8, EU L-22, EU L-23 and Lamination shall comply with the appropriate rule that requires work place standards in the operation of degreasing facilities.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The facilities (EU L-4, EU L-5, EU L-8, EU L-23 and EU SB-5) were constructed between October 7, 1974 and January 1, 1980 and do not have individual potential VOC emissions of 100 tons per year or greater.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The assembly and surface coating operations have applicable compliance monitoring conditions as specified below:

The amount of VOC, any single HAP delivered to the applicators in the assembly and surface coating operations, and the amount of any combination of HAPS delivered to the applicators including cleanup solvents must be monitored and recorded on a monthly basis for EU L-1, EU L-3 through EU L-6, EU L-8, EU L-22, EU L-23, EU SB-1, EU SB-3, EU SB-5 and Lamination and on a daily basis for EU SB-2, EU SB-6 and EU SB-7.

- (b) The woodworking facilities have applicable compliance monitoring conditions as specified below:

- (1) Daily visible emissions notations of the woodworking facilities cyclone and baghouse dust control exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
- (2) The cyclone and baghouse dust controls shall be operated with the woodworking facilities at all times.
- (3) The Permittee shall record the total static pressure drop across the baghouse controlling the woodworking, at least once daily when woodworking is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 2.0 to 4.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary to comply with the limits established in 326 IAC 6-3-2 (Process Operations).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPS) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations on page 1 of 2 of Appendix A.

Conclusion

The operation of this recreational vehicle manufacturing source shall be subject to the conditions of the attached proposed Part 70 Permit No. T 039-5080-00265.

Appendix A: Emission Calculations **Baghouse Operations**

Woodworking Operation
W-16

Company Name: Jayco, Inc.
Address City IN Zip: 903 South Main Street, Middlebury, IN 46540
Part 70 # T039-5080
Plt ID: 039-00265
Reviewer: Frank P. Castelli
Date: November 30, 1995

Unit ID	Control Efficiency	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lbs/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lbs/hr)	Emission Rate after Controls (tons/yr)
CE-16	97.98%	0.00125	10000.0	5.30	23.2	0.107	0.469
CE-21	98.00%	0.00125	10000.0	5.36	23.5	0.107	0.469

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Allowable Rate of Emissions

Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)	Allowable Emissions (tons/yr)
1100	0.55	2.75	12.0

Methodology

Allowable Emissions = 4.10(Process Weight Rate)^0.67

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Jayco, Inc.
Source Location: 903 South Main Street, Middlebury, IN 46540
County: Elkhart
Part 70 Operating Permit: OP T 039-5080-00265
SIC Code: 3792
Permit Reviewer: Frank P. Castelli

On September 19, 1998, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Jayco, Inc. had applied for a Part 70 Operating Permit to operate recreational vehicle manufacturing source with control. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On October 19, 1998, Danelle Miller Marks of Baker & Daniels on behalf of Jayco, Inc. submitted comments on the proposed Part 70 Operating Permit. The comments follow with the deleted language in the permit appearing as ~~strikeouts~~ and the new or revised language appearing as **bold** in the responses.

Comment 1:

Technical Support Document

Page 2

The TSD lists unpermitted facilities/units for which Jayco has applied for, and is entitled to, amnesty. The TSD should be revised to reflect that.

Response 1:

The determination of whether or not amnesty will be granted for the unpermitted facilities will be handled by the Compliance Branch of IDEM and has no bearing on the permit.

Comment 2:

Pages 7-9

Jayco has reviewed the federal and state applicability determinations, and believes that they have been accurately stated.

Response 2:

Thank you.

Comment 3:

Permit

Section A

Condition A.2 - Emission Units

Jayco believes that this section accurately describes emission units and pollution control devices.

Response 3:

Thank you for confirming that no changes are necessary in Condition A.2.

Comment 4:

Section B

Condition B.9 - Compliance with Permit Conditions

As written, this condition is legally inaccurate. For example, a violation of a state-only permit provision is not a violation of the federal Clean Air Act. State-only provisions are only enforceable at the state level. Therefore, the language of the condition should be changed as noted to more accurately reflect the law.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with ~~any provisions of this permit constitutes~~ may constitute a violation of the Clean Air Act and ~~is~~ may be grounds for:

Response 4:

IDEM is aware that noncompliance with conditions that are not federally enforceable may not constitute a violation of the Clean Air Act. Therefore, IDEM will make the following model change to subsection (a) of Condition B.9.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, **except those specifically designated as not federally enforceable**, constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

Comment 5:

Condition B.10 - Certification

The objected-to language extends the requirement regarding certified forms beyond the existing regulatory authority. Not all documents listed in this provision are required by law to be certified. Therefore, the language should be changed as noted to clarify that only those documents specifically designated by the permit or specifically required by an applicable requirement must be certified by a responsible official.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) ~~Any application form, report, or compliance certification~~ Where specifically designated by this permit or specifically required by an applicable requirement, any application forms, reports, or compliance certifications submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, ~~and any other certification required under this permit,~~ shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Response 5:

The specific permit conditions requiring submittal of documents will note when the responsible official's certification is required. Changes in this condition were made as follows:

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) **Where specifically designated by this permit or required by an applicable requirement, any** ~~Any~~ application forms, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, ~~and any other certification required under this permit,~~ shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

Comment 6:

Condition B.11 - Annual Compliance Certification

As currently drafted, the language requires that Jayco submit its annual compliance certification on April 15 of each year. Jayco proposes that such date be changed to July 1 of each year to accommodate Jayco's operational considerations.

Response 6:

IDEM, OAM has already divided the sources in the State into two (2) groups, corresponding to the deadlines for the submittals of emission statements, and all sources in Elkhart County are required to submit their annual compliance certification by April 15 of each year.

Therefore, since the comment did not present any compelling reason for the change, no change has been made to this condition of the permit.

Comment 7:

Condition B.12 - Preventive Maintenance Plan

The term "proper maintenance" as used here is unduly vague and likely will lead to future disputes. The obligation under this provision of the regulations is to implement the maintenance plan. Therefore, Jayco proposes that subsection (b) be changed as noted to clarify the condition.

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that ~~lack of proper maintenance~~ **failure to implement the plan** does not cause or contribute to a violation of any limitation on emissions or potential to emit.

Response 7:

This condition has been revised as suggested and is now as follows:

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that ~~lack of proper maintenance~~ **failure to implement the Preventive Maintenance Plan** does not cause or contribute to a violation of any limitation on emissions or potential to emit.

Comment 8:

Condition B.14 - Permit Shield

Jayco supports the express inclusion of the permit shield in this permit, as indicated in subsection (a). However, the permit language needs to implement the permit shield rather than restate the authorizing rule. The language contained in subsection (b)(1) and (b)(2) does not implement the permit shield, and appears to unnecessarily "qualify" the permit shield contained herein. Therefore, it should be deleted. During discussions with the Indiana Manufacturers Association Workgroup regarding the model Part 70 permit, IDEM agreed to make this change.

B.14 Permit Shield [326 IAC 2-7-15]

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, ~~provided that:~~
- (1) ~~The applicable requirements are included and specifically identified in this permit;~~
~~or~~
- (2) ~~The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~

Response 8:

This condition is almost exactly the wording required by 326 IAC 2-7-15. 40 CFR 70.6(f) states that the permitting authority may expressly include in a Part 70 permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements. OAM believes non-applicable requirement determinations should be dealt with in Section D. On July 28, 1998, the OAM was notified that the U.S. EPA would object to any Title V Operating Permit that superceded all previous construction permits. The U.S. EPA indicated that they believed that the authority for certain applicable requirements might expire if the construction permits that established them expired. The OAM believes that the regulatory process is best served if all affected parties are able to rely on the Title V Operating Permit to identify all applicable requirements and the means for demonstrating compliance with each requirement.

The OAM intends to continue discussions with the U.S. EPA regarding the issues related to past construction permits. However the OAM also believes that the Permit Shield condition B.14 (b) (1) & (2) establishes that the Title V permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of the permit shall be deemed in compliance with any applicable requirements as of the date of the permit issuance for all the previous permits identified by the source and the OAM during the course of this review. There will be no changes to this condition in the final permit due to this comment.

Comment 9:

Condition B.16 - Deviations from Permit Requirements and Conditions

The term "tied to" is vague and confusing. In addition, the language in subsection (b) does little to clarify what does or does not constitute a deviation. Therefore, Jayco proposes that the language be changed as noted to add clarity to this condition.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless ~~tied to~~ the compliance monitoring parameters are included as requirements in an applicable rule ~~or limit~~; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
 - ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~
 - ~~(4)~~(3) Inaccurate or incomplete information in a notification or report.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

Response 9:

The Condition B.16 below has been revised as follows. A deviation is defined in the condition as stated below:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless ~~lack of maintenance~~ **failure to implement the plan** has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

Comment 10:

Condition B.24 - Inspection and Entry

The Indiana Manufacturer's Association Workgroup and IDEM agreed in discussions regarding the model Part 70 permit to clarify that entry and access to the Permittee's premises and documents remains subject to the Permittee's right to claim confidentiality. Therefore, Jayco proposes that the language be changed as noted.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right to claim that information collected by the agency is confidential and must be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

Response 10:

This condition has been revised as suggested to clarify the permittee's rights and obligations to claim confidentiality under applicable law. The condition now reads:

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, **and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such**, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
- [326 IAC 2-7-6(6)]

Comment 11:

Condition B.28 - Credible Evidence

Jayco objects to and proposes to delete the "credible evidence" condition. First, credible evidence is not defined, and the condition itself is unduly vague, ambiguous, and confusing. Because credible evidence has no definitive boundaries, it should not be used as a compliance condition. IDEM has no authority to include such condition in this permit. Second, the applicable law spells out how compliance is to be determined and violations established. Each individual source has specific methods and tests contained in its permit that ensure compliance with the applicable emission limitations. IDEM simply has no regulatory authority to add this all-encompassing condition. For these reasons, the credible evidence condition should be deleted.

Response 11:

The IDEM now believes that Condition B.28 is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under this authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit.

~~**B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]**~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non-compliance.~~

Comment 12:

Section C

Condition C.9 - Compliance Schedule

Jayco proposes the noted changes to more accurately reflect the cited provision.

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (b) Has submitted a statement that the Permittee will continue to comply with ~~such~~ all applicable requirements; and
- (c) Will ~~comply with such~~ meet applicable requirements that become effective during the term of this permit.

Response 12:

The suggested changes in the language of this condition are appreciated. However, since they do not substantially alter the meaning of this standard condition, it has not been modified.

Comment 13:

Condition C.10 - Compliance Monitoring

The first sentence of this condition is unnecessary, and should be deleted. Further, the term "circumstances beyond its control" is unduly vague and could lead to confusion. Therefore, Jayco proposes that the condition be changed as noted to clarify that the Permittee may extend the compliance schedule if "ninety (90) days is an unreasonable period of time for the Permittee to install and operate the monitoring equipment."

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

~~Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met~~ ninety (90) days is an unreasonable period of time for the Permittee to install and operate the monitoring equipment, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Response 13:

The first sentence reiterates that the source shall comply with applicable requirements stated in the permit. Therefore, this sentence will not be deleted. A ninety (90) day period is not an unreasonable period of time to install any necessary equipment and to initiate any required monitoring related to that equipment. For example, if the equipment is ordered by a purchase order and the manufacturer is unable to deliver the product as promised due to extreme weather conditions, e.g., a flood, then the schedule would not be met due to circumstances beyond the source's control and an extension can be granted if the instructions are followed in the remainder of the condition.

Comment 14:

Condition C.11 - Maintenance of Monitoring Equipment

As a general matter, Jayco objects to general statements such as this that are confusing and have no specific relevance to its operation. In addition, Jayco objects to this condition because it goes beyond the authority granted under the referenced citations. Furthermore, to the extent that regulatory authority exists, this is dealt with elsewhere in the permit, such as in the required preventative maintenance plans. For these reasons, this condition should be deleted.

Response 14:

Conditions C.11 (Maintenance of Monitoring Equipment) and C.13 (Pressure Gauge Specifications) have been deleted from the proposed permit since there are no monitoring equipment required by this permit. All subsequent Section C conditions have been renumbered.

Comment 15:

Condition C.14 - Emergency Reduction Plans

An Emergency Reduction Plan for Jayco's Middlebury plant is being sent under separate cover. Jayco proposes that the language be changed to reflect Jayco's submission of the ERP.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee ~~shall prepare~~ has prepared a written emergency reduction plans (ERPs) plan (ERP) consistent with safe operating procedures.

(b) ~~These ERPs shall be submitted for approval to:~~

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~within ninety (90) days after the date of issuance of this permit.~~

~~The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Response 15:

It is standard language to include the date that the ERP was submitted to document compliance with this condition. As the Emergency Reduction Plan has not been submitted to date, this condition cannot be revised as suggested.

Comment 16:

Condition C.16 - Compliance Monitoring Plan

The language in this section is duplicative of language contained in Section D, which spells out clearly the compliance monitoring requirements. Furthermore, the language of this section goes beyond IDEM's authority in the referenced citations. The specified response requirements of a Compliance Response Plan are not reasonably ascertainable from the Rule. Therefore, Jayco proposes that the condition be changed as noted.

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- ~~(1) This condition;~~
 - ~~(2) The Compliance Determination Requirements in Section D of this permit;~~
 - ~~(3)(1) The Compliance Monitoring Requirements in Section D of this permit;~~
 - ~~(4)(2) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in and Section D of this permit; and~~
 - ~~(5) A Compliance Response Plan (GRP) for each compliance monitoring condition of this permit. GRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The GRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:~~
 - ~~(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and~~
 - ~~(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

- ~~(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.~~
- ~~(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:~~
 - ~~(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.~~
 - ~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;~~
 - ~~(3) An automatic measurement was taken when the process was not operating; or~~
 - ~~(4) The process has already returned to operating within "normal" parameters and no response steps are required.~~
- ~~(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~

Response 16:

The Compliance Response Plan and the Preventive Maintenance Plan are separate documents in part because of a difference in how to determine if the condition is violated. Failure to take the response steps prescribed in the Compliance Response Plan does constitute a violation of the permit. Failure to take an action prescribed in the Preventive Maintenance Plan does not constitute a violation of the permit, unless the failure to take the prescribed action causes a violation of any limitation on emissions or potential to emit.

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each Permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each Permittee's Annual Compliance Certification. Each Permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the Permittee's Preventive Maintenance Plan(PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the Permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the Permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a Permittee's maintenance staff handle the routine maintenance of the equipment, and a Permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comments sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a Permittee's PMP might call for the Permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the Permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the Permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the Permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most Permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The Permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the Permittee may know from experience, what replacement parts should be kept on hand. The Permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the Permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The Permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the Permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13) and for each FESOP permit pursuant to 326 IAC 2-8-4(9). Both of those rules refer back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most Permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manu-

facturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the Permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A Permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the Permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading (Guidance, page 13). Some of the terminology has changed, as a result of comments from regulated sources, but the requirements in the permit do not conflict with the guidance. There are no changes in the condition.

Comment 17:

Condition C.17 - Actions Related to Noncompliance Demonstrated by a Stack Test

Jayco proposes that this condition be deleted. Jayco understands that one of the goals of the part 70 permit program is to enhance compliance at the plant. To that end, it would help Jayco to comply if irrelevant provisions, such as this one, are deleted from the permit. Their existence is confusing and unnecessary.

Response 17:

Should a compliance test ever be required, performed and the test demonstrates noncompliance, Condition C.17 explains what protocol should follow after the noncompliance demonstration.

Comment 18:

Condition C.19 - Monitoring Data Availability

As with Condition C.17, the language of subsections (a), (b) and (c) of this paragraph go beyond the authority of the referenced citations. In addition, subsections (b) and (c) are unduly vague, as in the reference to "abnormal conditions." Furthermore, subsection (c) contains a general statement that appears to add requirements without authority. Accordingly, subsections (a), (b) and (c) should be deleted.

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- ~~(a) — With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.~~
- ~~(b) — As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or~~

~~perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.~~

- ~~(c) — If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.~~

Response 18:

Condition C.19 is required so that the source understands that all observations, sampling, maintenance procedures, and record keeping should be conducted when the emission units are operating under normal representative conditions, or what to note if the emission unit is not operating or operating under abnormal conditions.

Comments 19 and 20:

Condition C.20 - General Record Keeping Requirements

The requirement that the facility produce required records "upon request," depending on the circumstances, may be unreasonable. Therefore, Jayco proposes that the language be changed, as noted, to reflect the availability of such records "within a reasonable time." This change is consistent with the terms IDEM agreed to with the IMA/Chamber work group.

In addition, subsection (c)(4) should be deleted. It imposes an all-encompassing additional requirement to maintain records of all preventive maintenance regardless of whether the substantive permit conditions even require that such records be maintained. To the extent that records of preventive maintenance are required, they are addressed elsewhere in the permit.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available within a reasonable time upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available within a reasonable time upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - ~~(4) — Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken~~

~~shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C – Compliance Monitoring Plan Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~

Responses 19 and 20:

The last sentence of Condition C.20(a) already states that if records are requested via written request, then a reasonable amount of time is given to furnish said records. The last sentence already states this as the following:

If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time (emphasis added).

Therefore, it is not necessary to add the wording “within a reasonable time” as suggested.

The language of the condition is consistent with the rule and IDEM has not had any practical problems with compliance.

Condition (c)(4), has been deleted as suggested.

Comments 21 and 22:

Section D

Condition D.1 - Facility Description

The equipment descriptions in these sections are accurate, with the exception of the descriptions for (p) and (q). The descriptions provided do not reflect those provided in Section A or Section D.2. To maintain consistency and avoid confusion, they should be revised to reflect the description provided in A.

In addition, in D.1, D.2 and D.3, Jayco proposes the addition of language as noted that clarifies that the listing of facilities contained in these sections is merely descriptive information and does not constitute an enforceable condition.

Facility Description [326 IAC 2-7-5(15)] in Sections D.1, D.2 and D.3

The following is descriptive information and does not constitute an enforceable condition; however, the Permittee should be aware that physical changes or changes in the method of operation that may render this descriptive information obsolete or inaccurate may also trigger requirements for permits or permit modifications under 326 IAC 2.

~~(p) — One (1) repair spray booth, known as SB-7, to be installed in 1998, exhausted to P41, equipped with dry filter control, maximum capacity to support assembly line production.~~

~~(q) — One (1) repair spray booth, known as SB-6, to be installed in 1998, exhausted to P10, equipped with dry filter control, maximum capacity to support assembly line production.~~

Responses 21 and 22:

This wording has been added as suggested in the boxes of D.1, D.2 and D.3. The added wording is as follows:

The following is descriptive information and does not constitute an enforceable condition; however, the Permittee should be aware that physical changes or changes in the method of operation that may render this descriptive information obsolete or inaccurate may also trigger requirements for permits or permit modifications under 326 IAC 2.

Equipment items (p) and (q) were inadvertently included in both Sections D.1 and D.2. These equipment items have been deleted from only Section D.1 as shown in the comment.

Comment 23:

Condition D.1.2 - Volatile Organic Compounds

Jayco proposes that this language be changed as noted to read "The VOC emissions from assembly line EU L-6 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period." The lamination process is separate from this assembly line and VOC emissions come from a variety of sources such as adhesive application, caulking, wipe cleaning, etc.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The VOC ~~delivered to the applicators of the lamination booth~~ emissions from EU L-6 shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period.
- (b) Any change or modification which may increase actual VOC usage to twenty-five (25) tons per year or more from the fiberglass nose cone booth will make the facilities subject to 326 IAC 8-1-6.

Response 23:

Condition D.1.2(a) cannot be changed since OAM cannot determine compliance from emission but rather determines compliance based upon material usage.

Condition D.1.2 (a) and (b) have been revised to reference the vehicle assembly line, EU L-6 as follows:

- (a) The VOC delivered to the applicators of the **vehicle assembly line** ~~lamination booth~~ EU L-6 shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period.
- (b) Any change or modification which may increase actual VOC usage to twenty-five (25) tons per year or more from the **vehicle assembly line EU L-6** ~~fiberglass nose cone booth~~ will make the facilities subject to 326 IAC 8-1-6.

Comment 24:

Conditions D.1.3 - Particulate Matter

Jayco proposes that the language be changed as noted to clarify the meaning of the rule.

D.1.3, D.2.7, D.3.1 and D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Interpolation and extrapolation of the data for the process weight rate for one hundred (100) up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

Response 24:

The suggested wording has been implemented in all conditions referenced as shown above.

Comment 25:

Condition D.1.4 - Preventive Maintenance Plan

Jayco proposes that the language be changed as noted to clarify that the PMP is required only for the dry filters.

D.1.4 and D.2.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~these facilities and any control devices~~ the dry filters.

Response 25:

Pursuant to 326 IAC 1-6-3 (Preventive maintenance plans) any person responsible for operating any facilities specified in 326 IAC 1-6-1 shall prepare and maintain a Preventive maintenance plan. Facilities specified in 326 IAC 1-6-1 include all facilities to obtain a permit pursuant to 326 IAC 2-1-2, including those that do not have any control devices. Therefore no change in the permit is necessary.

Comment 26

Condition D.1.5 - Compliance Determination Requirements

Jayco proposes that the last two sentences of Condition D.1.5 be deleted, as they exceed IDEM's authority, and are unnecessary and confusing.

D.1.5, D.2.9, D.3.3 and D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Response 26:

These conditions state that no tests are required, but in the future should testing be required to show compliance with any existing or future applicable rules, IDEM has specified how the tests are to be performed. Therefore, these conditions have not been changed.

Comment 27:

Condition D.1.6 - Compliance Determination Requirements

Jayco proposes to delete "and usage limitations." No usage limits exist in D.1.1. Therefore, such language may cause unnecessary confusion. Also, Jayco proposes to delete the last sentence of Condition D.1.6. Inclusion of such language in this permit exceeds the authority granted to IDEM under the applicable regulations.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content ~~and usage limitations~~ contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. ~~IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

Response 27:

Condition D.1.2 does contain a VOC usage limitation, thus Condition D.1.2 has been cited and Condition D.1.6 has been revised as follows: The reservation of the authority requiring the use of Method 24 to verify VOC content is appropriate and is therefore retained.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 **and D.1.2** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Comment 28:

Condition D.1.7 - Compliance Determination Requirements

Jayco proposes that the language in (a) be revised as noted to more accurately reflect the requirements of Condition 1.2. In addition, the correct citation in Condition D.1.7(b) should be 1.1(a).

D.1.7 VOC Emissions

- (a) Compliance with Condition D.1.2 shall be demonstrated at the end of each month for EU L-6 based on the total volatile organic compound usage for the most recent twelve (12) consecutive month period.
- (b) Compliance with Condition D.1.1(a) shall be demonstrated at the end of each day for EU SB-2, based on the total volatile organic compound usage for the most recent day.

Response 28:

Conditions D.1.7(a) and (b) have been revised in the permit as suggested and shown in Comment 28. Since Condition D.1.2(a) references a limitation based on a twelve (12) consecutive month period, the change in time periods from a month is appropriate.

Comment 29:

Conditions D.1.9 and D.2.13 - Compliance Monitoring Requirements

Jayco proposes to delete this condition. Jayco believes that there are no compliance monitoring requirements applicable to this facility. Indiana guidance only requires compliance monitoring plans for units which (1) emit PM, sulfur dioxide, or VOCs; and (2) are subject to a NSPS or NESHAP; or the unit has a device to control emissions and allowable emissions exceed 10 lbs/hr. See IDEM CAM Guidance, p. 11. The volume of emissions here is limited, and does not necessitate this burdensome activity.

Response 29:

The IDEM guidance specifies that all surface coating emission units have compliance monitoring requirement conditions. However, the IDEM has revised the permit as noted.

Comment 30:

Condition D.1.10 - Record Keeping Requirements

As a general rule, record keeping and reporting requirements should be consistent with the other terms of the permit. To that end, Jayco proposes to delete the second (b), and to work with IDEM to ensure that record keeping remains consistent with other terms and conditions of the permit. In addition, while some record keeping provisions make sense and are acceptable to Jayco, Jayco finds the need to record daily the volume weighted VOC content of coatings burdensome and unnecessary. Therefore, Jayco proposes deleting subsection (a)(3) and (b)(3) to make this condition consistent with other proposed changes. In addition, Jayco proposes to delete (c), as it is duplicative and unnecessary. Jayco also proposes to clarify that such record keeping requirements apply only to EU SB-2.

D.1.10 Record Keeping Requirements

- (a) To document compliance of EU SB-2 with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. ~~Records maintained for (1) through (6) shall be taken daily for EU SB-2 shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.(5) below.~~
- (1) ~~The amount and~~ (1) The VOC content of each coating material and solvent used. ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage~~ Solvent records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) ~~The volume weighted VOC content of the coatings used for each day;~~
- (4)(3) The cleanup solvent usage for each day;
- (5)(4) The total VOC usage for each day; and

- ~~(6)~~(5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. ~~Records maintained for (1) through (6) shall be taken monthly for EU L-6 shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.2:(5) below.~~
- ~~(1) — The amount and~~(1) The VOC content of each coating material and solvent used. ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage~~ Solvent records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- ~~(3) The volume weighted VOC content of the coatings used for each month;~~
- ~~(4) The cleanup solvent usage for each month;~~
- ~~(5)~~(4) The total VOC usage for each month; and
- ~~(6)~~(5) The weight of VOCs emitted for each compliance period.
- ~~(b) — To document compliance with Condition D.1.3, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~
- ~~(c) — All records shall be maintained in accordance with Section C — General Record Keeping Requirements, of this permit.~~

Response 30:

Since Condition D.1.1 requires compliance with 326 IAC 8-2-9 on a daily volume weighted basis, the suggested changes for record keeping cannot be accepted. Usage is also necessary because the volume weighted average compliance basis is only required when VOC delivered to the applicators exceed fifteen (15) pounds per day. To substantiate the VOC content of the materials records must be kept, such as those items references in D.1.10(a).

Since Condition D.1.2 requires that VOC usage delivered to the applicator(s) be less than twenty-five (25) tons per twelve (12) consecutive month period, the "content" and volume weighted average descriptions in Condition D.1.10 (b)(1) and (b)(3) have been deleted and the remainder of the condition renumbered as follows:

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily for EU SB-2 shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day **when using non-compliant coatings**;
 - (4) The cleanup solvent usage for each day;
 - (5) The total VOC usage for each day; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through ~~(6)~~**(5)** below. Records maintained for (1) through ~~(6)~~**(5)** shall be taken monthly for EU L-6 shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.2.
- (1) The amount ~~and of~~ VOC ~~content of in~~ each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - ~~(3) The volume weighted VOC content of the coatings used for each month;~~
 - ~~(4)~~**(3)** The cleanup solvent usage for each month;
 - ~~(5)~~**(4)** The total VOC usage for each month; and
 - ~~(6)~~**(5)** The weight of VOCs emitted for each compliance period.
- ~~(b)~~**(c)** To document compliance with Condition D.1.3, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- ~~(e)~~**(d)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 31:

Condition D.2.10 - Compliance Determination Requirements

Jayco proposes to delete the last sentence of Condition D.2.10. Inclusion of such language in this permit exceeds the authority granted to IDEM under the applicable regulations.

D.2.10 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.2.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. ~~IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

Response 31:

The reservation of the authority requiring the use of Method 24 to verify VOC content is appropriate and is therefore retained.

Comment 32:

Condition D.2.14 - Record Keeping Requirements

As a general rule, record keeping and reporting requirements should be consistent with the other terms of the permit. To that end, Jayco proposes to delete (b) and to work with IDEM to ensure that all record keeping remains consistent with other terms and conditions of the permit. In addition, while some record keeping provisions make sense and are acceptable to Jayco, Jayco finds the need to record daily the volume weighted VOC content of coatings burdensome and unnecessary. Therefore, Jayco proposes deleting subsection (a)(3) to make this condition consistent with other proposed changes.

D.2.14 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records in accordance with (1) through (6) below. ~~Records maintained for (1) through (6) shall be taken daily for EU SB-6 and EU SB-7 shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.6.(5) below.~~
- (1) ~~The amount and~~(1) The VOC content of each coating material and solvent used. ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage~~ Solvent records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) ~~The volume weighted VOC content of the coatings used for each day;~~
- (4) The cleanup solvent usage for each day;
- (5)(4) The total VOC usage for each day; and
- (6)(5) The weight of VOCs emitted for each compliance period.
- (b) ~~To document compliance with Condition D.2.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~

- ~~(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

Response 32:

Since Condition D.2.6 requires that VOC usage delivered to the applicators be less than fifteen (15) pounds per day, the "content" and volume weighted average descriptions in Condition D.2.14 (a)(1) and (a)(3) have been deleted and the remainder of the condition renumbered as follows:

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records in accordance with (1) through ~~(6)~~**(5)** below. Records maintained for (1) through ~~(6)~~**(5)** shall be taken daily for EU SB-6 and EU SB-7 shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.2.6.
- (1) The amount ~~and of VOC content of in~~ each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- ~~(3) The volume weighted VOC content of the coatings used for each month;~~
- ~~(4)~~**(3)** The cleanup solvent usage for each month;
- ~~(5)~~**(4)** The total VOC usage for each month; and
- ~~(6)~~**(5)** The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit. The deleted language appears as ~~strikeouts~~, new language is **bolded**:

1. Condition C.2 has been updated to reflect the revision in 326 IAC 5-1-2 dated November 1, 1998. as follows:

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions~~ opacity shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~, any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.
2. The daily filter checks are one of the very few examples of a direct check on the air pollution control equipment that is included in IDEM compliance monitoring provisions. The OAM believes that this is a very effective means of ensuring ongoing compliance. Additional monitoring of emissions is still useful to ensure that the filter is operating as designed; however, this can be done less frequently. The new model requires weekly, rather than daily, visible observations and monthly, rather than weekly, rooftop over spray checks. Therefore, Condition D.1.9 has been revised as follows:

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray from the surface coating spray booth Stacks (P16-1, P4-1 and 2, P4-3 and P8-1), while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
3. Part (c) of Condition D.1.10 has been revised as follows:
- (c) To document compliance with Condition D.1.3, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

4. Parts (a) and (b) of Condition D.2.13 have been revised as follows:

D.2.13 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray from the surface coating spray booth Stacks (P10-1 and P41-1) while one or more of the booths are in operation.

The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Appendix A: Potential Emissions Calculations

VOC and HAPS

From Surface Coating Operations

Company Name: Jayco, Inc.
 Address City IN Zip: 903 Main Street, Middlebury, IN 46540
 Part 70: T039-5080
 Pit ID: 039-00265
 Reviewer: Frank P. Castelli
 Date: November 30, 1995

Actual 1997 Emission Based on 2080 Hours of Operation (tons per year)

	L1	L3	L4	L5	L6	L22	L23	L8	SB-1	SB-2, SB-3 & DB-4	SB-5	SB-6	SB-7	Lamination	Entire Plant
Toluene	0.051	0.930	10.149	0.229	3.592	0.041	1.091	0.001	0.000	0.028	0.000	0.000	0.000	0.000	16.112
Ethylbenzene	0.023	0.032	0.062	0.052	0.166	0.018	0.023	0.000	0.000	0.100	0.000	0.000	0.000	0.002	0.4780
Xylene	0.119	0.163	0.315	0.267	0.000	0.096	0.121	0.001	0.000	0.520	0.000	0.000	0.000	0.012	1.614
MEK	0.008	0.031	0.137	0.134	0.145	0.007	0.061	0.001	0.000	0.080	0.000	0.000	0.000	0.152	0.756
MIBK	0.000	0.001	0.003	0.001	0.005	0.000	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.011
Hexane	0.476	0.705	2.583	1.618	5.495	0.381	0.172	0.096	0.000	0.000	0.650	0.000	0.000	0.000	12.176
Methylene Chloride	0.003	0.000	0.000	0.000	0.000	0.003	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.551	0.557
1,1,1 Trichloroethane	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Total HAPS	0.680	1.862	13.249	2.301	9.403	0.546	1.469	0.099	0.000	0.728	0.650	0.000	0.000	0.717	31.704
VOC	2.933	3.011	16.797	7.149	17.725	2.642	1.841	0.241	0.000	2.011	1.443	0.000	0.000	0.877	56.669

Potential Emissions Based on 8760 Hours of Operation (tons per year)

Toluene	0.215	3.917	42.743	0.964	15.128	0.173	4.595	0.004	0.000	0.118	0.000	0.000	0.000	0.000	67.86
Ethylbenzene	0.097	0.135	0.261	0.219	0.699	0.076	0.097	0.000	0.000	0.421	0.000	0.000	0.000	0.008	2.01
Xylene	0.501	0.686	1.327	1.124	0.000	0.404	0.510	0.004	0.000	2.190	0.000	0.000	0.000	0.051	6.80
MEK	0.034	0.131	0.577	0.564	0.611	0.029	0.257	0.004	0.000	0.337	0.000	0.000	0.000	0.640	3.18
MIBK	0.000	0.004	0.013	0.004	0.021	0.000	0.004	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.05
Hexane	2.005	2.969	10.878	6.814	23.142	1.605	0.724	0.404	0.000	0.000	2.738	0.000	0.000	0.000	51.28
Methylene Chloride	0.013	0.000	0.000	0.000	0.000	0.013	0.000	0.000	0.000	0.000	0.000	0.000	0.000	2.321	2.35
1,1,1 Trichloroethane	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.00
Total HAPS	2.864	7.842	55.799	9.691	39.601	2.300	6.187	0.417	0.000	3.066	2.738	0.000	0.000	3.020	133.52
VOC	12.352	12.681	70.741	30.108	74.649	11.127	7.753	1.015	0.000	8.469	6.077	2.74*	2.74*	3.694	238.66
Limited Emissions					24.9										194.49

* PTE Based on 14.9 lbs per day max. No actual emissions for SB-6 and SB-7